

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:	*
ROSA IVETTE SANTOS CUADRADO	* CASE NO. 12-08295/BKT
Debtor(s)	* CHAPTER 7

DLJ MORTGAGE CAPITAL INC., SERVICED BY SELECT PORTFOLIO SERVICING, INC	* INDEX
	*
Movant	*
ROSA IVETTE SANTOS CUADRADO	*
	*
ROBERTO ROMAN VALENTIN	*
	*
<u>Respondent(s)</u>	

**DEBTOR'S RESPONSE TO MOTION FOR RELIEF OF STAY
UNDER 11 USC 362 (d) DOCKET NO. 48**

TO THE HONORABLE COURT:

NOW COMES, ROSA IVETTE SANTOS CUADRADO, debtor, through the undersigned attorney, and very respectfully states and prays as follows:

1. On May 3, 2017, DLJ Mortgage Capital Inc., c/o Select Portfolio Servicing, Inc., ("SPS"), filed a motion for relief from stay in the present bankruptcy case, docket no. 48, basically alleging that the debtor is arrears in the post-petition arrears in the mortgage loan payments to said creditor.

2. That the present case was originally filed as a Chapter 13 case, and on April 12, 2017, the same was converted to a case under Chapter 7, pursuant to Order, docket entry #39, terminating the services of Trustee Alejandro Oliveras Rivera, and appointing Roberto Roman Valentin, Esq., as the Chapter 7 Trustee, in the above captioned case.

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3. The debtor respectfully submits that she is hereby consenting to the lift of stay in favor of SPS to allow the debtor to meet with movant and request/apply for a loan modification directly with SPS.

4. Therefore, the debtor hereby consents to the lifting of the automatic stay in favor of SPS. In the event the parties do not reach an agreement as to the modification/refinancing of SPS mortgage loan, the debtor does not waive her right to be discharged of any personal liability regarding any deficiency claim that may result from an *IN REM* foreclosure action that could pursue SPS in order to foreclose on its collateral. 11 U.S.C. Section 727(b); 11 U.S.C. Section 524(a).

WHEREFORE, debtor respectfully requests from this Honorable Court to grant the present motion consenting to Select Portfolio's request for the lift of stay in the above captioned Index.

I CERTIFY that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF filing system, which will send notification of same to: the Chapter 7 Trustee, Roberto Roman Valentin, Esq.; Natalia M. Batista Vazquez, Esq., Counsel for Vazquez & Vizcarrondo LLP, Attorneys for DLJ Mortgage Capital; I also certify that a copy of this motion was sent via regular mail to the debtor/respondent Rosa Ivette Santos Cuadrado, Treasure Valley, H20 Las Americas Ave, Cidra, PR 00739.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 25th day of May, 2017.

/s/Roberto Figueroa Carrasquillo
USDC #203614
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